

# LAUBSCHER & LAUBSCHER

PATENTS, TRADEMARKS,  
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COMPETITION

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May 24, 2022

Catherine M.C. Farrelly  
Frankfurt Kurnit Klein & Selz  
28 Liberty Street  
New York, NY 10005

VIA E-MAIL AND FIRST-CLASS MAIL

Re: AAA24  
Service Mark Application No. 97/379,480  
Our File No. 28599

Dear Ms. Farrelly:

Our firm is intellectual property law counsel to the American Automobile Association, Inc., ("AAA") owner of the famous AAA trade and service marks. Among the many registrations that AAA owns on its AAA mark are registration Nos. 829265, 2158654, 5036379, and 4646626, copies of which are enclosed. As you will note, these registrations include arranging for discount purchases and administration of discount programs, among other services.

We have learned that you have filed the subject trademark applications for the AAA24 mark on behalf of A24 Films LLC based on an intent to use the mark in connection with "Providing membership club services for early or exclusive access to discount products, receipt of exclusive newsletters, access to special live entertainment events, exclusive social media access, birthday gifts, zines and direct to customer products."

This intended use of AAA as part of the referenced mark in connection with the recited services is likely to cause confusion, mistake or deception that the services are provided, authorized or sponsored by AAA. This use would infringe on AAA registrations and also dilute the distinctive quality of the AAA mark.

Accordingly, on behalf of AAA, we request that the referenced service mark application be withdrawn, and that A24 Films agree not to use AAA in connection with its services.

I look forward to receiving written confirmation that you will comply with these requests by June 14, 2022.

May 24, 2022  
Page 2 of 2

Sincerely,

A handwritten signature in blue ink that reads "Michael K. Fretwell". The signature is written in a cursive style with a large, stylized "M" and "F".

Michael K. Fretwell

MKF/mkf  
Enclosures

# United States Patent Office

829,265

Registered May 23, 1967

## PRINCIPAL REGISTER Service Mark

Ser. No. 230,991, filed Oct. 22, 1965

AAA

The American Automobile Association (Incorporated)  
(Connecticut corporation)  
1712 G St. NW.  
Washington, D.C. 20006

For: AUTOMOBILE ASSOCIATION SERVICES RENDERED TO MOTOR VEHICLE OWNERS, MOTORISTS, AND TRAVELERS GENERALLY—NAMESLY, OBTAINING MOTOR VEHICLE LICENSE PLATES AND TITLE CERTIFICATES; SPONSORING SCHOOL SAFETY PATROLS; ADVOCATING LEGISLATION FAVORABLE TO SAFE AND ECONOMICAL MOTOR VEHICLE TRAVEL, OPERATION, AND MAINTENANCE; CONDUCTING MOTOR VEHICLE TESTS AND MAKING TESTS OF AUTOMOTIVE AND RELATED PRODUCTS; AND RATING TOURIST ACCOMMODATIONS—in CLASS 100.

First use 1903; in commerce 1903.

For: ARRANGING FOR DISCOUNT PURCHASES, COLLECTING DAMAGE CLAIMS; OFFERING REWARDS FOR INFORMATION LEADING TO AR-

REST AND CONVICTION OF PERSONS STEALING MEMBERS' AUTOMOBILES; AND PLACING INSURANCE WITH UNDERWRITERS, in CLASS 101.

First use 1916; in commerce 1916.

For: PROVIDING BAIL BOND, in CLASS 102.

First use 1916; in commerce 1916.

For: PROVIDING EMERGENCY ROAD SERVICE, in CLASS 103.

First use 1916; in commerce 1916.

For: DISSEMINATING TRAVEL INFORMATION AND MAKING TRAVEL ARRANGEMENTS, in CLASS 105.

First use 1902; in commerce 1902.

For: TEACHING MOTOR VEHICLE OPERATION; CONDUCTING TRAFFIC AND PEDESTRIAN SAFETY CAMPAIGNS, AND GIVING TRAFFIC SAFETY LESSONS, in CLASS 107.

First use 1924; in commerce 1924.

Owner of Reg. Nos. 547,321 and 703,556.

**Int. Cls.: 16, 35, 36, 37, 39 and 42**

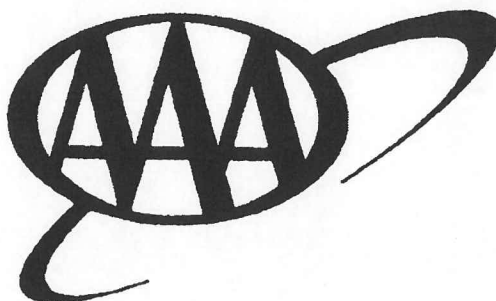
**Prior U.S. Cls.: 2, 5, 22, 23, 29, 37, 38, 50, 100,  
101, 102, 103, 105 and 106**

**Reg. No. 2,158,654**

**United States Patent and Trademark Office**

**Registered May 19, 1998**

**TRADEMARK  
SERVICE MARK  
PRINCIPAL REGISTER**



AMERICAN AUTOMOBILE ASSOCIATION,  
INC. (CONNECTICUT CORPORATION)  
1000 AAA DRIVE  
HEATHROW, FL 327465063

FOR: MAGAZINES, PAMPHLETS, BOOK-  
LETS, AND DIRECTORIES IN THE FIELDS OF  
TRAVEL INFORMATION, TRAFFIC SAFETY,  
VEHICLE INFORMATION AND REPAIR, AND  
DRIVER INSTRUCTION; MAPS, GROUPS OF  
STRIP AND OTHER MAPS, AND PRINTED  
BOOKLETS AND PAMPHLETS FEATURING  
TOURING AND ROUTE INFORMATION, IN  
CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND  
50).

FIRST USE 3-1-1997; IN COMMERCE  
3-1-1997.

FOR: ARRANGING FOR DISCOUNT PUR-  
CHASES, IN CLASS 35 (U.S. CLS. 100, 101 AND  
102).

FIRST USE 3-1-1997; IN COMMERCE  
3-1-1997.

FOR: ADJUSTING AND COLLECTING IN-  
SURANCE DAMAGE CLAIMS; INSURANCE

BROKERAGE SERVICES, NAMELY, OBTAIN-  
ING INSURANCE, PLACING INSURANCE  
WITH UNDERWRITERS; FINANCIAL SERV-  
ICES, NAMELY, ISSUING, PAYING, AND COL-  
LECTING TRAVELER'S CHECKS; BANKING  
SERVICES, NAMELY, TIME DEPOSITS; IN-  
VESTMENT ADVICE COUNSELING SERV-  
ICES; CREDIT CARD AND AUTO LOAN  
SERVICES; REIMBURSEMENT FOR LEGAL  
SERVICES, IN CLASS 36 (U.S. CLS. 100, 101  
AND 102).

FIRST USE 3-1-1997; IN COMMERCE  
3-1-1997.

FOR: EMERGENCY ROAD SERVICES, IN  
CLASS 37 (U.S. CLS. 100, 103 AND 106).

FIRST USE 3-1-1997; IN COMMERCE  
3-1-1997.

FOR: TRAVEL AGENCY SERVICES,  
NAMELY, MAKING RESERVATIONS AND  
BOOKING FOR TRANSPORTATION, IN CLASS  
39 (U.S. CLS. 100 AND 105).

FIRST USE 3-1-1997; IN COMMERCE  
3-1-1997.

2

2,158,654

FOR: AUTOMOBILE CLUB SERVICES, NAMELY, RATING TOURIST ACCOMMODATIONS; PROMOTING PUBLIC AWARENESS OF THE NEED FOR TRAFFIC AND PEDESTRIAN SAFETY BY MEANS OF SPONSORING SCHOOL SAFETY PATROLS AND CONDUCTING TRAFFIC AND PEDESTRIAN SAFETY CAMPAIGNS; PROMOTING THE INTERESTS OF AUTOMOBILE TRAVELERS BY ADVOCATING LEGISLATION FAVORABLE TO SAFE AND ECONOMICAL MOTOR VEHICLE TRAVEL, OPERATION, AND MAINTENANCE; CONSUMER PRODUCT SAFETY TESTING AND CONSULTATION, NAMELY, CONDUCTING MOTOR VEHICLE TESTS AND ENDUR-

ANCE TESTS, AND MAKING TESTS OF AUTOMOTIVE AND RELATED PRODUCTS; TRAVEL ARRANGING SERVICES, NAMELY, MAKING RESERVATIONS AND BOOKING FOR LODGING, IN CLASS 42 (U.S. CLS. 100 AND 101).

FIRST USE 3-1-1997; IN COMMERCE 3-1-1997.

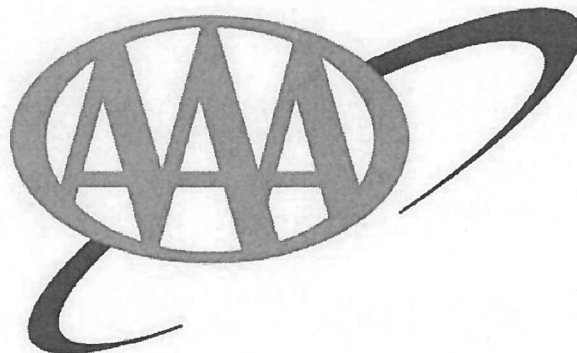
OWNER OF U.S. REG. NOS. 547,321, 1,784,437 AND OTHERS.

SER. NO. 75-263,675, FILED 3-25-1997.

ANDREW BENZMILLER, EXAMINING ATTORNEY

# United States of America

## United States Patent and Trademark Office



**Reg. No. 5,036,379**

**Registered Sep. 06, 2016**

**Int. Cl.: 16, 35, 36, 37, 39,  
41, 42, 43**

**Service Mark**

**Trademark**

**Principal Register**

American Automobile Association, Inc. (CONNECTICUT CORPORATION)  
1000 AAA Drive  
Heathrow, FL 32746

CLASS 16: Magazines, pamphlets, booklets, and directories in the fields of travel information, traffic safety, vehicle information and repair, and driver instruction; maps, groups of strip maps and other maps, and printed booklets and pamphlets featuring touring and route information

FIRST USE 3-1-1997; IN COMMERCE 3-1-1997

CLASS 35: Administration of a discount program for enabling participants to obtain discounts on goods and services through use of a discount membership card; Promoting public awareness of the need for traffic and pedestrian safety by means of sponsoring school safety patrols and conducting traffic and pedestrian safety campaigns; promoting the interests of automobile travelers by advocating legislation favorable to safe and economical motor vehicle travel, operation, and maintenance; automobile club services, namely, price comparison rating of the tourist accommodations of others

FIRST USE 3-1-1997; IN COMMERCE 3-1-1997

CLASS 36: Adjusting and collecting insurance damage claims; insurance brokerage services, namely, obtaining insurance, placing insurance with underwriters; financial services, namely, issuing, paying, and collecting traveler's checks; banking services, namely, time deposits; investment advice counseling services; credit card payment processing and auto loan brokerage services; reimbursement payment processing in the field of legal services

FIRST USE 3-1-1997; IN COMMERCE 3-1-1997

CLASS 37: Emergency road side repair services

FIRST USE 3-1-1997; IN COMMERCE 3-1-1997

CLASS 39: Travel agency services, namely, making reservations and booking for transportation; Providing a web site and web site links to geographic information, map images, and trip routing

FIRST USE 3-1-1997; IN COMMERCE 3-1-1997

CLASS 41: Providing on-line magazines in the field of travel; publication of electronic



*Michelle K. Lee*

Director of the United States  
Patent and Trademark Office



# United States of America

United States Patent and Trademark Office

## AAA DISCOUNTS & REWARDS

**Reg. No. 4,646,626**

**Registered Nov. 25, 2014**

**Int. Cl.: 35**

**SERVICE MARK**

**PRINCIPAL REGISTER**

AMERICAN AUTOMOBILE ASSOCIATION, INC. (CONNECTICUT CORPORATION)  
1000 AAA DRIVE  
HEATHROW, FL 32746

FOR: ADMINISTRATION OF A DISCOUNT PROGRAM FOR ENABLING PARTICIPANTS TO OBTAIN DISCOUNTS ON GOODS AND SERVICES THROUGH USE OF A DISCOUNT MEMBERSHIP CARD; PROMOTING THE GOODS AND SERVICES OF OTHERS BY MEANS OF AN INCENTIVE REWARD PROGRAM, IN CLASS 35 (U.S. CLS. 100, 101 AND 102).

FIRST USE 7-0-2014; IN COMMERCE 7-0-2014.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

OWNER OF U.S. REG. NOS. 703,556, 1,782,222, AND OTHERS.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "DISCOUNTS & REWARDS", APART FROM THE MARK AS SHOWN.

SN 86-181,266, FILED 1-31-2014.

JESSICA A. POWERS, EXAMINING ATTORNEY



*Nichelle K. Lee*

Deputy Director of the United States  
Patent and Trademark Office